GARVEY, SCHUBERT & BARER

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

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PEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

HENRY A. SOLOMON WASHINGTON, DC OFFICE DIRECT DIAL (202) 298-2529

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OUR FILE NO. 20849-00102-63 0658-102-63

Magalie R. Salas, Secretary Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554

> Reference: Joint Petition for Rule Making KMSR(FM), Sauk Center, MN KIKV-FM, Alexandria, MN

Dear Ms. Salas:

SEATTLE

EIGHTEENTH FLOOR

1191 SECOND AVENUE

SEATTLE, WASHINGTON 96:01-2939 (206) 464-3939

Submitted herewith on behalf of Main Street Broadcasting, Inc., licensee of KMSR (FM), Sauk Center, MN, and BDI Broadcasting, Inc., licensee of KIVK-FM Alexandria, MN, are an original and four copies of a Petition for Rule Making. The parties propose to switch channels and communities of license and to upgrade KIVK-FM.

If you have any questions regarding this matter, kindly communicate directly with the undersigned.

Henry A. Solomon

Counsel to Joint Petitioners

Enclosures HAS/blr

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AUG 17 2000

PEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

Amei Table	e Matter of ndments of Section 73.202(b) e of Allotments)	MM Docket No.
FM Broadcast Stations (Sauk Center, Minnesota) (Alexandria, Minnesota))	RM-
To:	Chief, Allocations Branch Policy and Rules Division	,	

Mass Media Bureau

JOINT PETITION FOR RULE MAKING

Main Street Broadcasting, Inc., licensee of Station KMSR(FM), Sauk Center, Minnesota ("Main Street"), and BDI Broadcasting, Inc., licensee of KIKV-FM, Alexandria, Minnesota ("BDI"), by their attorney and pursuant to 47 C.F.R. § 1.401 respectfully file this Joint Petition for Rule Making wherein they request that the Commission institute a rule making proceeding to concurrently (1) reallot Channel 232A from Sauk Center, Minnesota to Alexandria, Minnesota, (2) reallot Channel 264C1 from Alexandria, Minnesota, to Sauk Center, Minnesota, and (3) modify the license of KMSR(FM), Sauk Center, Minnesota to specify operation on Channel 232A at Alexandria, Minnesota; (4) modify the license of KIKV-FM, to specify operation on Channel 264C1 at Sauk Center, Minnesota, and (5) upgrade KMSR(FM) to enable it to operate as a Class C2 station on Channel 232 at Alexandria, Minnesota.

The proposed changes to the Table of Allotments are as follows:

¹ BDI Broadcasting, Inc., is in the process of acquiring KMSR(FM) from Main Street Broadcasting, Inc.

Community of License	Present Channel	Proposed Channel
Sauk Center, MN	232A	264C1
Alexandria, MN	208C3, 222C3 257A, 264C1	208C3, 222C3 232A, 257A

As set forth in the attached technical exhibit, which is incorporated by reference herein, these changes will serve the public interest. If the changes are made as proposed, the licensee of KMSR(FM) intends promptly to submit modification applications to the Commission to obtain construction permits in order to effectuate the requested changes and once granted, to expeditiously implement such construction permits. The licensee of KIKV-FM shall pursue similar undertakings with respect to modification of its station's license. Consequently, the parties respectfully request that the Commission expeditiously issue a Notice of Proposed Rule Making as herein requested and thereafter adopt such proposals.

Respectfully submitted,

MAIN STREET BROADCASTING, INC. & BDI BROADCASTING, INC.

By:

Henry A. Solomon

Their Attorney

Garvey, Schubert & Barer 1000 Potomac Street, NW Fifth Floor Washington, DC 20007 202/965-7880 (P) 202/965-1729 (F) August 17, 2000

BDI Broadcasting, Inc. Main Street Broadcasting, Inc JOINT PETITION for RULE MAKING

This Joint Petition for Rule Making is filed by BDI Broadcasting, Inc., licensee of KIKV, Alexandria, Minnesota and Main Street Broadcasting, Inc., licensee of KMSR, Sauk Center, Minnesota. It is the desire of these two licensees to swap cities of license so that KMSR may receive an upgrade from Class A to Class C2.

First, let us examine KMSR, which is proposed to be Channel 232C2 at

Alexandria, Minnesota. Exhibit #1A is a §73.207 spacing study, which indicates no
shortages to any station other than itself. Exhibit #1B is the class maximum 70 dBu

Contour from the hypothetical reference location utilizing uniform terrain. 100% of the
city of Alexandria, Minnesota is served by the 70 dBu contour.

Regarding KIKV, the new city of license is proposed to be Sauk Centre,

Minnesota. No change of transmitter location is proposed for KIKV. Exhibit #2A is the

§73.207 spacing study and Exhibit #2B indicates the class maximum 70 dBu contour

assuming uniform terrain. 100% of the city of Sauk Centre is served by the 70 dBu

theoretical contour.

An analysis of the new KMSR areas and population is as follows:

KMSR's Class A license serves 15,342 people within 1529.0 square kilometers. This proposed C2 facility would serve 63,515 people within 8,560.3 square kilometers.

When ordered to the new facilities, both BDI Broadcasting, Inc. and Main Street, Inc. pledge to timely file any necessary paperwork to become licensed at the desired facilities at the desired city of license.

Bromo Communications, Inc.
Atlanta, Georgia

August 2000

The following summarizes this joint request:

City	Present	Proposed
Sauk Centre, Minnesota	232A	264C1
Alexandria, Minnesota	208C3, 222C3 257A, 264C1	208C3, 222C3 232A, 257A

Due to the expanded coverage of persons and area it is thought that the above proposed change of the Table Of Allotments would be in the public interest.

All information contained herein is thought to be true and accurate to the knowledge of the undersigned.

Clifton G. Moor

Bromo Communications, Inc.

August 15, 2000

EXHIBIT #1A BDI Broadcasting, Inc. Main Street Broadcasting, Inc. JOINT PETITION FOR RULE MAKING

KMSR §73.207 ALLOCATION STUDY

Searching at Class C2 Reference
Alexandria Minnesota

REFERENCE	G1.140	-2	DISPLA	Y DATES
45 47 28 N 95 41 23 W C	CLASS = C	iZ	DATA	04-15-00
95 41 25 M	al 232 - 04	:ings	SEARCE	. 08-13-00
Call Channel Location N. Lat. W. Lng.		Dist Azi	FCC	Margin
N. Lat. W. Lng.	Power	HAAT		
AVAC VAC 232A SAUK CENTRE 45 42 30 95 06 18 N Branstock Communications,	MN	46.42 101.3	166.0	-119.58
45 42 30 95 06 18 N	6.000 kW	100 M		
Branstock Communications,				
Branstock Communications, KMSR LIC 232A SAUK CENTRE 45 42 30 95 06 18 CN Branstock Communications, KMSR.A APP 231A SAUK CENTRE 45 43 00 95 06 37 CX Branstock Communications, KKLN.A APP 231A ATWATER 45 04 24 94 45 20 CX KVIS FM. Inc.	MN	46.42 101.3	166.0	-119.58
45 42 30 95 06 18 CN	3.000 kW	91 M		
Branstock Communications,	BLH7025			
KMSR.A APP 231A SAUK CENTRE	MN	45.84 100.2	106.0	-60.1 6
45 43 00 95 06 37 CX	6.000 kW	89 M		
Branstock Communications,	BPH20000	217ACA		
KKLN.A APP 231A ATWATER	MN	109.20 137.3	106.0	2.20
45 04 24 94 45 20 CX	6.000 kW	100 M		
Kyrs Fm, Inc.	BPH20000	217ACB		
KKLN LIC 231A ATWATER	MN	108.20 137.3	106.0	2.20
45 04 24 94 45 20 CN	3.000 kW	100 M		
Kyrs Fm, Inc.	BLH19881	203KC		
KFML LIC 231A LITTLE FALLS	MN	108.28 76.8	106.0	2.28
46 00 16 94 19 42 CN	3.000 kW	100 M		
Kltf/kfml, Inc.	BLH19881	206KA		
KFML.A APP 231A LITTLE FALLS	MN	108.32 76.8	106.0	2.32
46 00 15 94 19 40 CX	6.000 kW	100 M		
Kltf/kfml. Inc.	BPH20000	217ABZ		
KKINFM LIC 232C3 AITKIN	MN	189.58 57.4	177.0	12.58
46 41 18 93 35 58 CN	14.000 kW	133 M		
## 45 04 24 94 45 20 CX Kyrs Fm, Inc.	BLH19960	911KA		
KSTPFM LIC 233C ST. PAUL	MN	215.39 111.2	188.0	27.39
45 03 45 93 08 22 CY 1	00-000 kW	372 M		
Hubbard Broadcasting Inc.	BMT.H1991	0923KF		
KSKK LTC 234C2 STAPLES	MN	87.47 39.5	58.0	29.47
46 23 43 Q4 57 54 CN	35 000 kW	95 M	3000	40.00
Normin Broadcasting Co	DI U10050	51783		
Normin Broadcasting Co. KKRC LIC 230A GRANITE FALLS 44 51 24 95 37 46 CN	BUILTAGO	103 06 177 4	55 0	48 96
AA SI DA OS DE AG CU	C OOO lest	103.90 177.9	33.0	40.50
44 51 24 95 5/ 46 UN	DITTO COS	01086		
rowa City Broadcasting Com	BFH13331	UIZKC		
Iowa City Broadcasting Com KDOMFM LIC 232A WINDOM 43 53 06 95 10 56 CN Windom Radio, Inc.	MN	215.59 169.1	166.0	49.59
43 33 05 95 10 56 CN	5.700 kW	102 M		
Windom Radio, Inc.	BLH19920	130 K 9		

Bromo Communications, Inc. Atlanta, Georgia

ltlanta, Georgi: August 2000

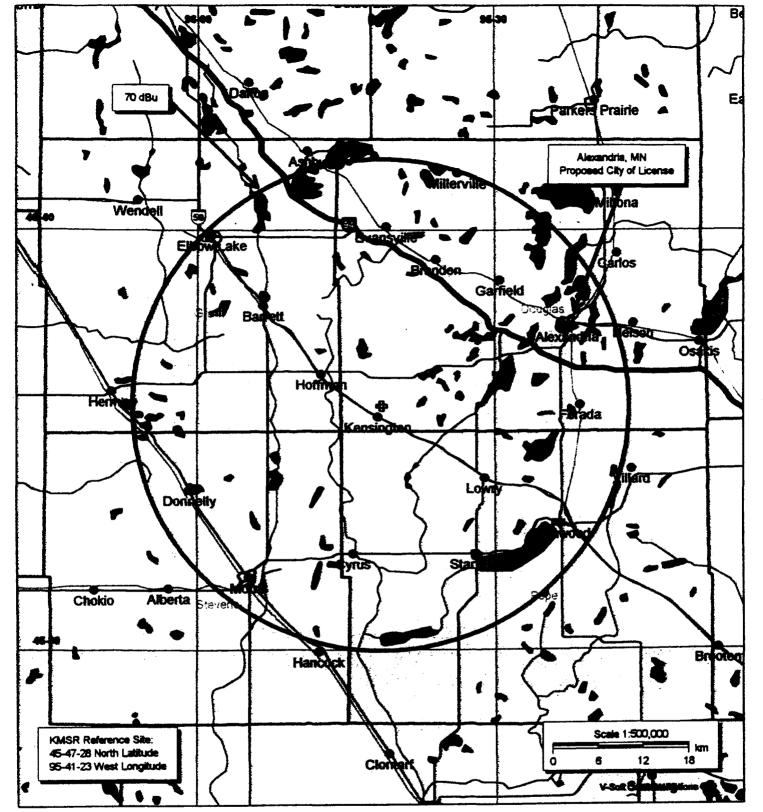


EXHIBIT #1B

CLASS MAXIMUM 70 dBu CONTOUR ASSUMING UNIFORM TERRAIN KMSR (FM)

Channel 232C2 - 94.3 MHz 50 kW ERP - 150 m HAAT

Bromo Communications, Inc. Atlanta, Georgia August 2000

EXHIBIT #2A BDI Broadcasting, Inc. Main Street Broadcasting, Inc. JOINT PETITION FOR RULE MAKING

KIKV §73.207 ALLOCATION STUDY

Searching at Class C1 Reference Sauk Centre Minnesota

REFERENCE 45 41 03 N 95 08 14 W	CLASS = 0 Current Space Inel 264 - 10	C1 cings DO.7 MHz	DISPLA DATA SEARCH	Y DATES 04-15-00 08-15-00
Call Channel Location	n _	Dist Azi	FCC	Margin
WINDER TO OCCUPATION AT EVANDED	MN	0.00 0.0	245.0	-245.00
N. Lat. W. Ing. KIKVFM LIC 264C1 ALEXANDRIA 45 41 03 95 08 14 CN Bdi Broadcasting, Inc. KOLV LIC 261C2 OLIVIA 44 58 14 95 14 59 CN Bold Radio, Inc. KRKH.C CP 264C3 HARWOOD 47 08 43 96 58 18 DCX Randy K. Holland KRKH.A APP 264C3 HARWOOD 47 08 43 96 58 18 CX Randy K. Holland KRKH.C CP 264C3 HARWOOD 47 08 25 97 00 09 CN Randy K. Holland KRKH.C CP 264C3 HARWOOD 47 09 25 97 00 09 CN Randy K. Holland KSJRFM LIC 211C1 COLLEGEVILLE 45 29 52 94 32 14 CN Minnesota Public Radio	100.000 kW	244 M	, 21011	
Bdi Broadcasting, Inc.	BLH7358		. 70 0	0.00
KOLV LIC 261C2 OLIVIA	MN	79.80 180.4	19.0	0.80
44 58 14 95 14 59 CN	50.000 kW	142 M		
Bold Radio, Inc.	BLH1999	0122KA	211 0	4 1 1
KRKH.C CP 264C3 HARWOOD	ND	215.11 319.0	211.0	4.11
47 08 43 96 58 18 DCX	25.000 KW	100 M	•	
Randy K. Holland	BWAHTAA	91000AAG - 215 11 - 319 1	211 0	4.11
KRKH.A APP 264C3 HARWOOD	מיין מסט ביט	100 M	211.0	
47 08 43 96 58 18 CX	23.000 KM	91001336		
Randy K. Holland	טא	217 63 319.5	5 211.0	6.63
KRKH.C CP 264C3 HARWOOD	25 000 kW	100 M		
7/ 09 25 9/ 00 09 CN	BPH1995	0921MG		
Randy R. HOLLAND	MN	51.20 113.	7 34.0	17.20
45 29 52 94 32 14 CN	100.000 kW	258 M		
Minnesota Public Radio	BMLED19	880616KA		
WCMPFM LTC 265C3 PINE CITY	MN	171.24 81.	1 144.0	27.24
45 54 07 92 57 25 DCN	25.000 kW	84 M		
Pine City Broadcasting Com	BLH1993	0814KG		
KXAC LIC 263C2 ST. JAMES	MN	201.48 162.	7 158.0	43.48
43 57 03 94 23 25 DC	34.000 kW	180 M		
Minnesota Valley Broadcast	BLH1999	0402KE		
KXAC.C CP 263C2 ST. JAMES	MN	201.49 162.	7 158.0	43.48
43 57 03 94 23 25 CN	34.000 kW	180 M		
Minnesota Valley Broadcast	BMPH199	90402ID		45 50
AVAC VAC 261A PEQUOT LAKES	MN	120.52 31.	75.0	45.52
46 36 11 94 18 33 N	6.000 kW	100 M		
Minnesota Christian Broado				47 51
RDEL DEL 263C2	MN	205.51 167.	9 158.0	47.51
43 52 29 94 36 04	50.00 0 kW	150 M		
	9714			40.00
950612 APP 261A PEQUOT LAKES	MN	123.87 26.	3 75.0	48.87
A5 29 52 94 32 14 CN Minnesota Public Radio WCMPFM LIC 265C3 PINE CITY 45 54 07 92 57 25 DCN Pine City Broadcasting Com KXAC LIC 263C2 ST. JAMES 43 57 03 94 23 25 DC Minnesota Valley Broadcast KXAC.C CP 263C2 ST. JAMES 43 57 03 94 23 25 CN Minnesota Valley Broadcast AVAC VAC 261A PEQUOT LAKES 46 36 11 94 18 33 N Minnesota Christian Broadc RDEL DEL 263C2 43 52 29 94 36 04 950612 APP 261A PEQUOT LAKES 46 40 48 94 25 02 CN Carol J. Delahunt	1.250 kW	219 M		
Carol J. Delahunt	BPH1995	0612MH		

Bromo Communications, Inc.

Atlanta, Georgia August 2000

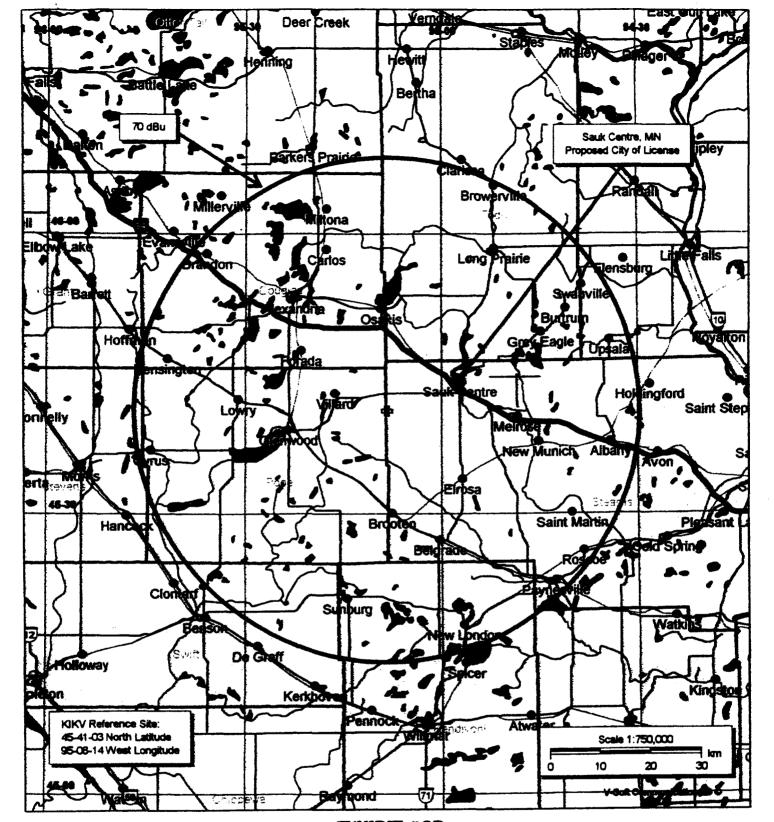


EXHIBIT #2B

CLASS MAXIMUM 70 dBu CONTOUR ASSUMING UNIFORM TERRAIN

KIKV-FM

Channel 264C1 - 100.7 MHz 100 kW ERP - 299 m HAAT

Brome Communications, Inc. Atlanta, Georgia August 2000